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8 Attorneys for the United States

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10
11 IN THE UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 APPROXIMATELY \$269,565.50 SEIZED FROM
17 FIRST RELIANCE BANCSHARES, INC.
18 ACCOUNT NUMBER 5220000969, HELD IN THE
19 NAME OF LIFESTYLE DEVELOPMENT, LLC,

20 APPROXIMATELY \$1,373.95 SEIZED FROM
21 VALLEY NATIONAL BANK ACCOUNT
22 NUMBER 8843534202, HELD IN THE NAME OF
23 LIFESTYLE DEVELOPMENT, LLC,

24 APPROXIMATELY \$7,982.56 SEIZED FROM
25 FIRST RELIANCE BANCSHARES, INC.
26 ACCOUNT NUMBER 5210000745, HELD IN THE
27 NAME OF THOMAS EIDE,

28 APPROXIMATELY \$50,000.00 SEIZED FROM
MAINSTREET BANK ACCOUNT NUMBER
2010039009, HELD IN THE NAME OF PRV
INTERNATIONAL, LLC,

APPROXIMATELY \$36,650.38 SEIZED FROM
BANK OF AMERICA, N.A. ACCOUNT NUMBER
383019458700, HELD IN THE NAME OF
VITAKEM NUTRA, AND

STIPULATION AND ORDER EXTENDING
TIME FOR FILING A COMPLAINT FOR
FORFEITURE AND/OR TO OBTAIN AN
INDICTMENT ALLEGING FORFEITURE

1 APPROXIMATELY \$37,886.31 SEIZED FROM
2 SOUTHSTATE BANK, NA ACCOUNT NUMBER
3 8010002012630, HELD IN THE NAME OF
SARAH NICK,

4 Defendants.

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6 It is hereby stipulated by and between the United States of America and potential claimants
7 Thomas Eide on behalf of himself and Lifestyle Development, LLC, PRV International, LLC, and
8 Vitakem Nutra, by and through their respective counsel, and Sarah Nick, on behalf of herself, appearing
9 *in propria persona* (“claimants”), as follows:

10 1. On or about May 7, 2024, the U.S. Postal Inspection Service (“USPIS”) seized the above-
11 referenced defendant funds pursuant to Federal seizure warrants (hereafter collectively “defendant
12 funds”).

13 2. Under 18 U.S.C. §§ 983(a)(1)(A)(i)-(iv), and 983(a)(3)(A), the United States is required to
14 send notice to potential claimants, file a complaint for forfeiture against the defendant funds, or obtain an
15 indictment alleging that the defendant funds are subject to forfeiture within one hundred and fifty days of
16 seizure, unless the court extends the deadline for good cause shown or by agreement of the parties. That
17 deadline is October 4, 2024.

18 3. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
19 January 2, 2025, the time in which the United States is required to file a civil complaint for forfeiture
20 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
21 forfeiture.

22 4. Accordingly, the parties agree that the deadline by which the United States shall be
23 required to file a complaint for forfeiture against the defendant funds and/or to obtain an indictment

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1 alleging that the defendant funds are subject to forfeiture shall be extended to January 2, 2025.

2 Dated: 10/3/2024

PHILLIP A. TALBERT
United States Attorney

3 By: /s/ Kevin C. Khasigian
4 KEVIN C. KHASIGIAN
5 Assistant U.S. Attorney

6 Dated: 9/30/2024

7 /s/ Daniel Olmos
8 DANIEL OLmos
9 Attorney for potential claimant
10 Thomas Eide on behalf of himself and Lifestyle
11 Development, LLC
12 600 University Avenue
13 Palo Alto, CA 94301
14 (Signature authorized by email)

15 Dated: 10/1/2024

16 /s/ Oliver M. Krischik
17 OLIVER M. KRISCHIK
18 Attorney for potential claimant
19 PRV International, LLC
20 1055 Thomas Jefferson Street NW, Suite 620
21 Washington, DC 20007
22 (Signature authorized by email)

23 Dated: 10/3/2024

24 /s/ Daniel Conti
25 DANIEL CONTI
26 Attorney for potential claimant
27 Vitakem Nutra
28 626 Rexcorp Plaza
Uniondale, NY, 11556
(Signature authorized by email)

20 Dated: 10/3/2024

21 /s/ Sarah Nick
22 SARAH NICK
23 Potential claimant
24 *Appearing in propria persona*
25 2027 Brick Kiln Parkway
26 Mount Pleasant, SC 29466
27 (Signature authorized by email)

28 **IT IS SO ORDERED.**

29 Dated: _____

30 _____
31 United States District Judge